

**REMARKS/ARGUMENTS**

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow. Claims 3, 5, 15, 17, and 24 have been canceled. Claims 26-30 have been withdrawn based on a previous restriction requirement. Claims 1, 4, 6, 14, 16, 18, 21, and 25 have been amended. Claims 1, 2, 4, 6-14, 16, 18-23, and 25 are currently pending in this application.

Claims 1 and 14 largely were amended to include the limitations of claims 5 and 15, respectively. Claim 21 was amended to include a similar limitation to claim 5. Claims 4, 6, 16, 18, and 25 were amended to correct their dependencies and antecedent basis based on the amendments to claims 1, 14, and 21. No new matter has been added. As such, Applicants respectfully submit that the amendments to the claims do not necessitate a new search by the Examiner. Additionally, Applicants respectfully request that the amendments be entered to place the application in better condition for appeal.

**Rejections Under 35 U.S.C. § 103(a)**

A. Claims 1, 2, 4-8, 10-14, 16-23, and 25

In Section 3 of the Office Action, Claims 1, 2, 4-8, 10-14, 16-23, and 25 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 7,006,671 to Yamaguchi (Yamaguchi) in view of U.S. Patent No. 7,068,309 to Toyama et al. (Toyama). Applicants respectfully traverse the rejection.

Independent claim 1, with emphasis added, recites in part:

selectively presenting a summary profile in the user interface,  
wherein the summary profile comprises a plurality of images of the  
individual captured at different times as part of the multi-modal  
chronological dossier of the individual.

Independent claim 14, with emphasis added, recites in part:

means for selectively presenting a summary profile in the user  
interface, wherein the summary profile comprises a plurality of  
images of the individual captured at different times as part of the  
multi-modal chronological dossier of the individual.

Independent claim 21, with emphasis added, recites in part:

selectively present a summary profile in the user interface, wherein the summary profile comprises a plurality of images of the individual captured at different times as part of the multi-modal chronological dossier of the individual.

Neither Yamaguchi nor Toyama teach, suggest, or describe the multi-modal chronological dossier required by claims 1, 14, and 21.

On page 3 of the Office Action, the Examiner states that Yamaguchi teaches a multi-modal chronological dossier at “col. 5, lines 31-54, col. 2, line 20 to col. 3, line 33; Figs. 2, 3A, 3B; and col. 5, line 61 to col. 6, line 3”. On page 6 of the Office Action, the Examiner states that Yamaguchi “teaches selectively presenting the summary profile on the user interface (col. 9, lines 62-64).” However, Yamaguchi fails to teach, suggest, or describe the multi-modal chronological dossier or the summary profile required by claims 1, 14, and 21 at these passages or anywhere else.

At col. 5, lines 31-54, the first section cited by the Examiner, Yamaguchi states:

The storage device 11 stores, for each registered person, pieces of information including the captured image or extracted feature as the specific information of the registered person, the dictionary, the name of the registered person, the registration number, the registration date when these pieces of information are stored in the storage device 11, and the use situation such as the date/time and place of identification of the registered person. The pieces of information registered for each registered person have, e.g., the data format as shown in FIG. 2. At the initial time, the pieces of information are arranged in the order of, e.g., registration.

The presentation device 12 can present the pieces of information stored in the storage device 11, including its sequential structure, to the administrator who administrates the personal identification apparatus, as needed. For example, when the administrator requests the personal identification apparatus to present “persons to be identified, who recently used the personal identification apparatus” or “images of persons who used the personal identification apparatus from X to Y o’clock”, pieces of information stored in the storage device 11 are read out and presented to the presentation device 12. The administrator can easily obtain necessary information at a necessary time.

Thus, Yamaguchi describes a **logging** system which provides information on people who use an apparatus and maintains summary totals associated with use of the system. As shown

with reference to Figs. 2, 3A, 3B, also cited by the Examiner, the logging system maintains a single record for each registered person which includes initial identification information and summary information associated with use of the identification apparatus. For example, as shown in Fig. 3A of Yamaguchi, a field of the record includes a “Number of Times of Classification” field with a total number. The record does not include “a plurality of images of the individual captured at different times as part of the multi-modal chronological dossier” as required by claims 1, 14, and 21. Yamaguchi teaches a history of usage, not a dossier or history of a person.

Col. 2, line 20 - col. 3, line 33, the second section cited by the Examiner, is a complete recitation of the summary of the invention of Yamaguchi. At col. 2, line 20 - col. 3, line 26, Yamaguchi, with emphasis added, states:

It is therefore an object of the present invention to provide a personal identification apparatus which reduces the time required for verification between registered persons and an object person and suppresses the standby time for verification of the object person by appropriately changing the registration order of the registered persons in accordance with the use situation of the registered persons on, e.g., an access control system, and a method therefor.

...

The registered information operation device sorts the pieces of information of the registered persons in accordance with the elapse time from the preceding classification time or the frequency of classification and makes it possible to execute classification preferentially for persons with high use frequency.

...

The personal identification apparatus using biometrics may require control to exclude, from the classification targets, a specific person who is registered in the registered information storage device or set a valid date. For example, control is required to inhibit a person from using the authentication system only during a certain period because his/her feature used for biometric authentication cannot be extracted because of injury or the like, or set specific groups in the database and make the system to classify a group A at a time and a group B at another time. Hence, when a function of selecting the data is added, the convenience can be improved.

Thus, again Yamaguchi describes a **logging** system which provides information on the frequency with which people use an identification apparatus and maintains summary totals

associated with use of the system to reduce “the time required for verification between registered persons and an object person.” (Col. 2, lines 23-26). Saving “a plurality of images of the individual captured at different times as part of the multi-modal chronological dossier” as required by claims 1, 14, and 21 increases the time required for verification. As a result, Yamaguchi teaches away from use of a “multi-modal chronological dossier of an individual.”

Additionally, in the system of Yamaguchi, when a person is injured in such a way that “biometric authentication cannot be extracted” the person is excluded from using the system instead of adding updated biometric authentication information to the record. Thus, Yamaguchi clearly fails to contemplate capture of “a plurality of images of the individual captured at different times as part of the multi-modal chronological dossier” as required by claims 1, 14, and 21 so that continued use of the identification apparatus could be accomplished despite the injury. Thus, Yamaguchi fails to suggest or teach the claim limitation which includes a “multi-modal chronological dossier of an individual.”

At col. 5, line 61 to col. 6, line 3, the third section cited by the Examiner, Yamaguchi states:

More specifically, the control determination device 13 determines the sorting method for the information stored in the registered information storage device 2, computes the time required for determination of sorting, or changes the items. The sorting device 14 receives the stored information to change the order of registered information, sorts the pieces of received information in accordance with the reference designated by the control determination device 13, and transmits the sorted information to the registered information storage device 2.

Thus, again Yamaguchi describes a **logging** system which provides information sorted on the frequency with which people use an identification apparatus to reduce “the time required for verification between registered persons and an object person.” (Col. 2, lines 23-26). Yamaguchi fails to contemplate capture of “a plurality of images of the individual captured at different times as part of the multi-modal chronological dossier” as required by claims 1, 14, and 21 so that continued use of the identification apparatus could be accomplished despite the injury.

At col. 9, lines 62-64, the fourth section cited by the Examiner, Yamaguchi states:

The administrator can check the use situations of the registered persons or select a defined number of persons to be identified, so the convenience can be improved, and the computation cost can be reduced.

Thus, again Yamaguchi describes a **logging** system which provides information about the frequency with which people use an identification apparatus to reduce “the time required for verification between registered persons and an object person.” (Col. 2, lines 23-26). Yamaguchi fails to contemplate capture of “a plurality of images of the individual captured at different times as part of the multi-modal chronological dossier” as required by claims 1, 14, and 21.

At col. 9, lines 25-37, Yamaguchi, with emphasis added, states:

face information representing a plurality of face patterns regarding the same person, for example, frontal face, oblique face and face wearing glasses are included in the dictionary. The face patterns are read out from the dictionary and verified with the object face in identifying or classifying. Concretely, a classification screen and candidate screens are displayed on a display device of the personal identification apparatus as shown in FIG. 6. The classification screen displays the face of the object person, and the candidate screens display a plurality of face patterns read out from the dictionary. In this manner, if a plurality of face patterns of the same person are stored in the dictionary, classification accuracy is improved.

The face patterns are associated with different views of the face of the object person with and without certain features such as glasses. Yamaguchi fails to contemplate capture of “a plurality of images of the individual captured at different times as part of the multi-modal chronological dossier” as required by claims 1, 14, and 21. Instead, Yamaguchi teaches use of face patterns created based on a single capture of a face of the object person. The face patterns can be created based on rotation of the image of the person and addition of external features such as glasses as shown in Fig. 6 of Yamaguchi.

Toyama is directed to “system and method for providing a peer-to-peer photo-sharing environment.” (Abstract). Thus, Toyama provides no teaching whatsoever of “a plurality of images of the individual captured at different times as part of the multi-modal chronological dossier” as required by claims 1, 14, and 21. Therefore, the combination of Yamaguchi and Toyama does not suggest or teach all of the limitations required by claims 1, 14, and 21. Claims 2, 4, 6-13 depend from claim 1. Claims 16, 18-20 depend from claim 14. Claims 22, 23, and 25

depend from claim 21. As a result, Applicants respectfully request withdrawal of the rejection of Claims 1, 2, 4, 6-14, 16, 18-23, and 25 under 35 U.S.C. § 103(a).

B. Claim 9

In Section 4 of the Office Action, Claim 9 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Yamaguchi in view of Toyama, and further in view of U.S. Patent No. 6,047,282 to Wilson et al. (Wilson). Applicants respectfully traverse the rejection.

Claim 9 depends from Claim 1, 7, and 8. As discussed above, the combination of Yamaguchi and Toyama does not suggest or teach all of the claim limitations of Claim 1. The Examiner notes that Yamaguchi and Toyama do not teach “speech” but that Wilson allegedly does at Col. 7, lines 19-35. Wilson does not teach all of the claim limitations of Claim 1, as discussed in the Appeal Brief, and in a prior Office Action, the Examiner admitted Wilson does not teach the claim element including the “chronological dossier” element missing from Yamaguchi and Toyama. (See page 4, Final Office Action dated February 10, 2006.) Accordingly, the combination of Yamaguchi, Toyama, and Wilson does not describe, suggest or teach all of the limitations required by Claim 9. As a result, Applicants respectfully request withdrawal of the rejection of Claim 9 under 35 U.S.C. § 103(a).

Applicants believe that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check or credit card payment form being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petition for such extension under

37 C.F.R. §1.136 and authorize payment of any such extensions fees to Deposit Account  
No. 19-0741.

Respectfully submitted,

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